

REMARKS

This is a response to the Office Action mailed on March 25, 2004.

Claims 1-28 and 31-44 are amended to clarify the features of the invention. Entry of the amended claims is appropriate since no new issues are raised that would require significant reconsideration, and the amended claims place the application in condition for allowance or in better condition for appeal. For example, in amended claim 1, the target application program was previously referred to in claim 3. Claim 1 also refers to an application program as previously referred to, e.g., in claim 12. Also, in claim 1, sub-paragraph (a), a typographical error, which is believed to be self-evident, is corrected by changing "embedding and enabling engine" to "embedding an enabling engine". Claims 15 and 31 are amended analogously. Claims 29 and 30 are cancelled.

The Examiner maintains the rejection of claims 1-44 under 35 U.S.C. § 103(a) as being unpatentable over Abu-Hakima (U.S. Patent No. 6,499,021) in view of Mehr, *et al.* (U.S. Patent No. 6,438,547) (hereinafter "Mehr").

Regarding paragraph 18 of the Office Action, page 6, regarding point (3), the Examiner asserts that "claims 1, 15 and 31 are not directed to embedding 'enabling engine' into program". As stated above, a typographical error has been corrected in claims 1 and 31 by changing "and" to "an". Claims 1 and 31 now clearly refer to, in sub-paragraph (a), "embedding an enabling engine". Moreover, note that claim 15, sub-paragraph (b), already referred to "an enabling engine embedded in..." The Examiner is therefore requested to re-visit this interpretation of claims 1, 15 and 31.

Independent claims 1, 15 and 31 note that the invention is concerned with navigating between two or more application programs. An enabling engine is embedded in an origin application program, and the origin application program is instantiated to provide an origin application program instance. The enabling engine is invoked for the origin application program instance, where the enabling engine is responsive to the origin application program instance for enabling navigation. A rule-base is interrogated, and at least one condition associated with the origin application program instance is retrieved. The at least one condition is used to query and evaluate data managed by the origin application program instance. At least one navigation path is established and displayed to a user for navigating to at least one target application program, which is different than the origin application program. Finally, claim 1 sets

forth that the at least one navigation path is displayed via a graphical display by utilizing the queried and evaluated data.

In contrast, Abu-Hakima is not concerned with a generalized navigation mechanism that allows a user to navigate from an origin application program to at least one target application program via a graphical display as claimed. Instead, Abu-Hakima is directed to interpreting and managing electronic messages. Abu-Hakima teaches interpreting and selectively forwarding an interpreted message derived from a user's received electronic message, such as e-mail, fax, converted voice and pager message, to a mobile communications device. Specifically, Abu-Hakima teaches navigation through a structured knowledge base using the content of the received e-message and determines key term(s) relating to the content as a result of such navigating. Thus, Abu-Hakima is concerned with a single messaging repository rather than a generalized navigation mechanism between application programs, as set forth in Applicant's claims.

Regarding the Examiner's statement in paragraph 18 of the Office Action, page 6, regarding point (1), the Abu-Hakima knowledge base is clearly not an application program as set forth in Applicant's claims. As explained by Abu-Hakima, Abstract, "A structured knowledge base comprises knowledge objects of user-related information and the knowledge objects are interlinked by semantic links to permit dynamic navigation thereof." Applicant therefore respectfully disagrees with the Examiner's assertion that a knowledge base is a program "by definition". The Examiner is requested to document any such definition. For comparison, an example of an application program, which Applicant's invention is concerned with, is Lotus Notes®, which is a database management system that allows users to access, share and manage information over a network (specification, page 1, line 35 to page 2, line 9).

Regarding the Examiner's statement in paragraph 18 of the Office Action, page 6, regarding point (2), it is asserted that Abu-Hakima teaches instantiation of a program. However, in fact, it is only stated by Abu-Hakima that instantiation of a knowledge object is provided. As discussed, an object, such as a knowledge object, is not an application program. Furthermore, Abu-Hakima states that "Each knowledge object is concept-based (not rule-based) and may contain any number of facts, rules and/or algorithms". This means that the knowledge object is not driven by a rules engine. Accordingly, Abu-Hakima is not concerned with a rule-base as set forth in Applicant's claims.

Regarding the feature in claim 1 of establishing and displaying at least one navigation path to a user for navigating to at least one target application program, the Examiner asserts (Office Action, par. 5, page 3) that this feature is met by the combination of Mehr and Abu-Hakima. However, Mehr is only concerned with navigating through a hierarchy of instances of data objects based on a user-selected view (Mehr, column 9, lines 27-30). Mehr is therefore not concerned with displaying at least one navigation path to a user for navigating to at least one target application program. Moreover, the Examiner asserts that a motivation for combining Mehr and Abu-Hakima is to "enhance performance by allowing the user to execute the desired program by simply selecting the navigation path." However, as discussed above, the structured knowledge base of Abu-Hakima is not an application program that can be executed by a user. Moreover, it is not clear what performance enhancement is referred to by the Examiner. The Examiner is requested to explain this further. Clearly, Mehr and Abu-Hakima, taken alone or in combination, do not disclose or suggest navigating between application programs as set forth in Applicants claims.

Applicant refers also on his comments in the previous response.

Independent claims 1, 15 and 31, and the dependent claims thereof, are therefore believed to be clearly allowable over the cited references. Withdrawal of the rejection is therefore respectfully requested.

In sum, Applicant believes that the above-identified application is in condition for allowance and henceforth respectfully solicits the allowance of the application. If the Examiner believes a telephone conference might expedite the allowance of this application, the Applicant respectfully request that the Examiner call the undersigned, Applicant's attorney, at the following telephone number: (516) 742-4343.

Respectfully submitted,



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